

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

SPRING VALLEY BRANCH OF THE  
NATIONAL ASSOCIATION FOR THE  
ADVANCEMENT OF COLORED PEOPLE;  
JULIO CLERVEAUX; CHEVON DOS  
REIS; ERIC GOODWIN; JOSE VITELIO  
GREGORIO; DOROTHY MILLER;  
HILLARY MOREAU; and WASHINGTON  
SANCHEZ,

Plaintiffs,

v.

EAST RAMAPO CENTRAL SCHOOL  
DISTRICT,

Defendants.

Case No: 7:17 Civ 08943(CS)(JCM)

**NOTICE OF RULE 72(a) OBJECTION TO, AND MOTION TO RECONSIDER,  
MAGISTRATE JUDGE'S DECEMBER 3, 2018 ORDER GRANTING DEFENDANT'S  
MOTION TO QUASH SUBPOENAS DIRECTED TO DAVID BUTLER**

**PLEASE TAKE NOTICE** that pursuant to Fed. R. Civ. P. 72(a), Plaintiffs National Association for the Advancement of Colored People, Spring Valley Branch; Julio Clerveaux; Chevon Dos Reis; Eric Goodwin; Jose Vitelio Gregorio; Dorothy Miller; Hillary Moreau; and Washington Sanchez ("Plaintiffs"), by and through undersigned counsel, object to the Magistrate Judge's December 3, 2018 Order (*See* Dec. 3, 2018 Minute Entry.) granting Defendant East Ramapo Central School District's ("Defendant") motion to quash subpoenas directed to David J. Butler, and hereby move this Court to reconsider and reverse and/or amend the Magistrate Judge's Order. In the alternative, Plaintiffs respectfully request that the Court hold its final decision until the parties have a final order from the Second Circuit regarding

whether Harry Grossman must testify at a deposition. Plaintiffs also file the attached memorandum of law in support of their objection and motion to reconsider.

\* \* \*

**LATHAM & WATKINS, LLP**

Dated: December 17, 2018

s/ Claudia Salomon

---

Claudia Theda Salomon

885 Third Avenue

New York, NY 10022

Telephone: (212) 906-1200

Facsimile: (212) 751-4864

Email: [claudia.salomon@lw.com](mailto:claudia.salomon@lw.com)

*Counsel for Plaintiffs*

*National Association for the Advancement of  
Colored People, Spring Valley Branch, Julio  
Clerveaux, Chevon Dos Reis, Eric Goodwin, Jose  
Vitelio Gregorio, Dorothy Miller, Hillary Moreau,  
and Washington Sanchez*

**CERTIFICATE OF SERVICE**

I hereby certify that on, December 17, 2018, a true and correct copy of the foregoing was served by CM/ECF on all counsel of record, including the following:

David J. Butler  
Randall Levine  
101 Park Avenue  
New York, NY 10178  
T: (212) 309-6000  
F: (212) 309-6001  
david.butler@morganlewis.com  
randall.levine@morganlewis.com

William Cravens  
Clara Kollm  
Adam Adler  
1111 Pennsylvania Avenue,  
NW Washington, DC 20004  
T: (202) 739-3000  
F: (202) 739-3001  
william.cravens@morganlewis.com  
clara.kollm@morganlewis.com  
adam.adler@morganlewis.com

s/ Claudia Salomon

---

Claudia Salomon